

RULE 1201

HEXAVALENT CHROMIUM - CHROME PLATING AND CHROMIC ACID ANODIZING

WORKSHOP REPORT

A workshop notice was mailed to all previously noticed facilities with chrome plating and/or chromic acid anodizing equipment in San Diego County, the Environmental Protection Agency [EPA], the California Air Resources Board [ARB] and other interested parties.

The workshop was held on January 17, 1991, and was attended by 8 people. As a result of a comment received prior to the workshop, a change was made to one of the definitions. This change was discussed at the workshop. The District response to workshop comments is as follows:

ARB PRE-WORKSHOP COMMENT

The definition of "Uncontrolled Chromium Emissions" makes reference to the Air Pollution Control District Manual of Procedures. This definition must specify ARB Method 425.

DISTRICT RESPONSE

The District will specify ARB Method 425 in the definition of "Uncontrolled Chromium Emissions".

WORKSHOP COMMENT

ARB Method 425A has been approved. Shouldn't the proposed changes also specify or allow the use of ARB Method 425A?

DISTRICT RESPONSE

The District has discussed Method 425A with ARB. There is no Method 425A. ARB has revised Method 425 to incorporate what is being referred to as Method 425A.

WORKSHOP COMMENT

Are the emission standards in the proposed changes based on controlled or uncontrolled emissions? Could the definition of "Facility-Wide Emissions from Hard Chrome Plating or Chromic Acid Anodizing" be clarified by removing or modifying reference to an emissions collection system?

DISTRICT RESPONSE

The rule's emission standards are based upon a facility's actual emissions, including emissions reductions achieved by any existing emission control equipment. In order to further clarify the definition of "Facility-Wide Emissions from Hard Chrome Plating or Chromic Acid Anodizing",

the District has modified language in the definition to specify emissions from emissions collection systems and associated control equipment.

WORKSHOP COMMENT:

Why was the phrase "to the satisfaction of the Air Pollution Control Officer" deleted from the proposed regulation?

DISTRICT RESPONSE:

The EPA will not approve this type of discretionary language and requires that it be removed from District Rules and Regulations.